

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

OCT 3 0 2020

PATRICK KEANEY Clerk, U.S. District Court Deputy Clerk

UNITED STATES OF AMERICA,

Plaintiff,

v.

Hood,

ERIC YSIDRO CASTILLO, BLANCHE ELIZABETH DYER a/k/a Blanche Elizabeth Jackson, MARK LEWIS CROWELL a/k/a Carl Crowell, ANITA LORENE COOPER, ANGELA MARIE MCDANIEL a/k/a Angela Marie Williams, MICHAEL OTIS HUNSAKER JR., JASON DON ROWAN, CLINT ENGLAND COOPER, SCOTT JAMES LIVELY, RICHARD DEAN MEALER, JESSICA LYNN BAKER, BOBBI DAWN BENEFIELD, MARK ROBERT PIERCE, MARK WAYNE STUBBLEFIELD, CARA DAWN NICOLE O'LAUGHLIN a/k/a Cara Dawn Nicole Martin, JARROD LEE SHANKS, AMANDA JOYCE KING, JOSEPH MICHAEL PHILLIPS, and EVERETT WAYNE HOOD JR. a/k/a E.J.

Defendants.

SEALED

Case No. CR 20-127

INDICTMENT

The Federal Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

- 1. **ERIC YSIDRO CASTILLO** was a resident of Cushing, Oklahoma, which is in the Western District of Oklahoma, and was also known as "M-Big E."
- 2. **BLANCHE ELIZABETH DYER** was a resident of Oklahoma City, Oklahoma, which is in the Western District of Oklahoma, and was also known as "Momma B" and "Blanche Elizabeth Jackson."

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- 3. MARK LEWIS CROWELL was a resident of Oklahoma City, Oklahoma, which is in the Western District of Oklahoma, and was also known as "Carl Crowell."
- 4. **ANITA LORENE COOPER** was a resident of Wagoner, Oklahoma, which is in the Eastern District of Oklahoma.
- 5. ANGELA MARIE MCDANIEL was a resident of Joplin, Missouri, which is in the Western District of Missouri, and was also known as "Angela Marie Williams."
- 6. MICHAEL OTIS HUNSAKER JR. was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 7. **JASON DON ROWAN** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 8. **CLINT ENGLAND COOPER** was a resident of Fort Gibson, Oklahoma, which is in the Eastern District of Oklahoma.
- 9. **SCOTT JAMES LIVELY** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 10. **RICHARD DEAN MEALER** was a resident of Okay, Oklahoma, which is in the Eastern District of Oklahoma.
- 11. **JESSICA LYNN BAKER** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 12. **BOBBI DAWN BENEFIELD** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 13. MARK ROBERT PIERCE was a resident of Braggs, Oklahoma, which is in the Eastern District of Oklahoma.

- 14. MARK WAYNE STUBBLEFIELD was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 15. CARA DAWN NICOLE O'LAUGHLIN was a resident of Fort Gibson, Oklahoma, which is in the Eastern District of Oklahoma, and was also known as "Cara Dawn Nicole Martin."
- 16. **JARROD LEE SHANKS** was a resident of Webbers Falls, Oklahoma, which is in the Eastern District of Oklahoma.
- 17. **AMANDA JOYCE KING** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 18. **JOSEPH MICHAEL PHILLIPS** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma.
- 19. **EVERETT WAYNE HOOD JR.** was a resident of Muskogee, Oklahoma, which is in the Eastern District of Oklahoma, and was also known as "EJ."

COUNT ONE

DRUG CONSPIRACY [21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A)]

Numerical paragraphs 1 through 23 of the Introduction are re-alleged and incorporated herein by reference.

Beginning on a date in June 2019, the exact date being unknown to the Grand Jury, and continuing until on or about the date of this Indictment, in the Eastern District of Oklahoma and elsewhere, ERIC YSIDRO CASTILLO, BLANCHE ELIZABETH DYER, ANITA LORENE COOPER, MARK LEWIS CROWELL, ANGELA MARIE MCDANIEL, MICHAEL OTIS HUNSAKER JR., JASON DON ROWAN, CLINT ENGLAND COOPER, SCOTT JAMES

LIVELY, RICHARD DEAN MEALER, JESSICA LYNN BAKER, BOBBI DAWN BENNEFIELD, MARK ROBERT PIERCE, MARK WAYNE STUBBLEFIELD, CARA DAWN NICOLE O'LAUGHLIN, JARROD LEE SHANKS, AMANDA JOYCE KING, JOSEPH MICHAEL PHILLIPS, and EVERETT WAYNE HOOD JR., defendants herein, did willfully and knowingly combine, conspire, confederate, and agree together, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 21, United States Code, Section 846, as follows:

OBJECTS OF THE CONSPIRACY

- 1. To knowingly and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
- 2. To knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS OF THE CONSPIRACY

In order to accomplish the objects of the conspiracy, the defendants and other persons known and unknown to the Grand Jury:

- 1. Possessed with the intent to distribute and distributed methamphetamine to other individuals both known and unknown to the Grand Jury.
- 2. Acquired quantities of methamphetamine from sources located in, but not limited to, communities in the Western District of Oklahoma.

- 3. Arranged for the transport of quantities of methamphetamine from the Western District of Oklahoma and other places to the Eastern District of Oklahoma and elsewhere.
- 4. Maintained locations and residences in Oklahoma City, Oklahoma, where methamphetamine was brought to be divided among conspirators for distribution within the Eastern District of Oklahoma and elsewhere.
- 5. Collected, stored and transported sums of United States Currency derived from the sale of methamphetamine.
- 6. Acquired certain assets, including houses, guns, and vehicles, to facilitate the distribution of methamphetamine.
- 7. Used certain automobiles to further their narcotics conspiracy by traveling to Oklahoma City, Oklahoma, and elsewhere in order to facilitate the acquisition and distribution of methamphetamine.
- 8. Used electronic communications equipment to further their narcotics conspiracy by use of cellular telephones, via standard cellular telephone service and social media platforms, to communicate with co-conspirators both known and unknown to the Grand Jury and with customers to whom they distributed methamphetamine.
- 9. It was part of the conspiracy and understood that individual conspirators could contact their own sources, cultivate their own customers, and otherwise act independently when they desired, but although there were disagreements, the conspirators, with knowledge and support of each other's unlawful methamphetamine distribution activities, each conspirator at some time during the course of the conspiracy knowingly and intentionally agreed and acted together jointly with other conspirators to advance the common overall goal of buying, selling and otherwise distributing methamphetamine.

OVERT ACTS OF THE CONSPIRACY

In furtherance of the conspiracy and to effect and accomplish its objectives, the Defendants, and others known and unknown to the Grand Jury, committed the following overt acts, among others, in the Eastern District of Oklahoma and elsewhere:

- 1. On or about June 10, 2019, **ANITA LORENE COOPER** possessed with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine.
- 2. On or about June 14, 2019, **ANITA LORENE COOPER** possessed eight firearms for use in connection with the distribution of methamphetamine.
- 3. On or about June 25, 2019, **EVERETT WAYNE HOOD JR.** possessed with the intent to distribute 5 grams or more of methamphetamine (actual).
- 4. On or about August 29, 2019, **ANITA LORENE COOPER** directed an individual to distribute an amount of methamphetamine.
- 5. On or about September 9, 2019, ANITA LORENE COOPER directed an individual to distribute an amount of methamphetamine.
- 6. On or about September 10, 2019, ANITA LORENE COOPER directed MICHAEL OTIS HUNSAKER JR. to distribute an amount of methamphetamine to an individual.
- 7. On or about September 23, 2019, ANITA LORENE COOPER directed an individual to distribute an amount of methamphetamine.
- 8. On or about October 2, 2019, an individual arranged for the delivery of drug proceeds to ANITA LORENE COOPER.

- 9. On or about October 13, 2019, ANITA LORENE COOPER and MARK WAYNE STUBBLEFIELD possessed with the intent to distribute an amount of methamphetamine.
- 10. On or about October 25, 2019, ERIC YSIDRO CASTILLO and BLANCHE ELIZABETH DYER possessed with the intent to distribute a large quantity of methamphetamine in Fayetteville, Arkansas.
- 11. On or about November 18, 2019, ANITA LORENE COOPER directed JESSICA LYNN BAKER to distribute methamphetamine to an individual.
- 12. On or about December 6, 2019, ANITA LORENE COOPER agreed to distribute methamphetamine to JASON DON ROWAN.
- 13. On or about December 13, 2019, **ANITA LORENE COOPER** agreed to distribute methamphetamine to **JESSICA LYNN BAKER**.
- 14. On or about December 14, 2019, **ANITA LORENE COOPER** agreed to distribute methamphetamine to **JESSICA LYNN BAKER**.
- 15. On or about December 15, 2019, **ANITA LORENE COOPER** agreed to distribute 50 grams or more of methamphetamine to **JESSICA LYNN BAKER**.
- 16. On or about December 18, 2019, ANITA LORENE COOPER and JESSICA LYNN BAKER distributed an amount of methamphetamine.
- 17. On or about December 21, 2019, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to **AMANDA JOYCE KING**.
- 18. On or about December 30, 2019, **JASON DON ROWAN** collected drug proceeds for **ANITA LORENE COOPER**.

- 19. On or about January 15, 2020, JARROD LEE SHANKS and CARA DAWN NICOLE O'LAUGHLIN possessed with intent to distribute an amount of methamphetamine.
- 20. On or about January 15, 2020, **JARROD LEE SHANKS** possessed a Taurus Model PT738 TCP .380 acp semi-automatic pistol in furtherance of a drug trafficking crime.
- 21. On or about January 16, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to AMANDA JOYCE KING.
- 22. On or about January 21, 2020, **ANITA LORENE COOPER** distributed 50 grams or more of methamphetamine (actual).
- 23. On or about January 26, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to MICHAEL OTIS HUNSAKER JR.
- 24. On or about January 27, 2020, **ANITA LORENE COOPER** distributed 50 grams or more of methamphetamine (actual) to an individual in Locust Grove, Oklahoma.
- 25. On or about February 2, 2020, ANITA LORENE COOPER asked JASON DON ROWAN to collect drug proceeds from JESSICA LYNN BAKER.
- 26. On or about February 11, 2020, **ANITA LORENE COOPER** distributed 50 grams or more of methamphetamine (actual) to an individual.
- 27. On or about February 19, 2020, JASON DON ROWAN agreed to collect drug proceeds for ANITA LORENE COOPER.
- 28. On or about February 21, 2020, **ANITA LORENE COOPER** agreed with another individual to distribute methamphetamine to an individual.
- 29. On or about February 22, 2020, ANITA LORENE COOPER possessed with intent to distribute 5 grams or more of methamphetamine (actual).

- 30. On or about February 26, 2020, **ANITA LORENE COOPER** distributed 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine.
- 31. On or about March 5, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to AMANDA JOYCE KING.
- 32. On or about March 10, 2020, **ANITA LORENE COOPER** directed an individual to distribute an amount of methamphetamine.
- 33. On or about March 11, 2020, **ANITA LORENE COOPER** distributed 50 grams or more of methamphetamine (actual).
- 34. On or about March 11, 2020, **ANITA LORENE COOPER** gave an individual an amount of U.S. currency for the methamphetamine **COOPER** distributed earlier that day.
- 35. On or about March 13, 2020, **JASON DON ROWAN** agreed to collect drug proceeds from an individual.
- 36. On or about March 27, 2020, **ANITA LORENE COOPER** met with **MARK ROBERT PIERCE** in Muskogee, Oklahoma for the distribution of methamphetamine.
- 37. On or about May 12, 2020, ANITA LORENE COOPER, MICHAEL OTIS HUNSAKER JR., and RICHARD DEAN MEALER traveled to Midwest City, Oklahoma to pick up an amount of methamphetamine from BLANCHE ELIZABETH DYER.
- 38. On or about May 14, 2020, **ANITA LORENE COOPER** distributed 5 grams or more of methamphetamine (actual) to an individual.
- 39. On or about May 20, 2020, **ANITA LORENE COOPER** distributed an amount of methamphetamine to an individual.
- 40. On or about May 21, 2020, RICHARD DEAN MEALER met with ANITA LORENE COOPER in Locust Grove, Oklahoma to pick up money owed for methamphetamine.

- 41. On or about May 21, 2020, **BOBBI DAWN BENEFIELD** rented a vehicle for **ANITA LORENE COOPER** to drive to Oklahoma City to pick up methamphetamine.
- 42. On or about May 21, 2020, ANITA LORENE COOPER distributed an amount of methamphetamine to BOBBI DAWN BENEFIELD in Wagoner, Oklahoma for future distribution.
- 43. On or about May 21, 2020, ANITA LORENE COOPER agreed to distribute methamphetamine to JASON DON ROWAN.
- 44. On or about May 21, 2020, **SCOTT JAMES LIVELY** distributed an amount of methamphetamine to an individual in Tulsa, Oklahoma for **ANITA LORENE COOPER**.
- 45. On or about May 21, 2020, ANITA LORENE COOPER distributed an amount of methamphetamine to SCOTT JAMES LIVELY in Tulsa, Oklahoma.
- 46. On or about May 21, 2020, ANITA LORENE COOPER and MICHAEL OTIS HUNSAKER JR. traveled to BLANCHE ELIZABETH DYER's residence in Oklahoma City to pick up methamphetamine.
- 47. On or about May 22, 2020, ANITA LORENE COOPER distributed an amount of methamphetamine to BOBBI DAWN BENEFIELD.
- 48. On or about May 22, 2020, ANITA LORENE COOPER agreed to distribute a large amount of methamphetamine to JASON DON ROWAN.
- 49. On or about May 23, 2020, **ERIC YSIDRO CASTILLO** agreed to distribute a large amount of methamphetamine to **ANITA LORENE COOPER**.
- 50. On or about May 23, 2020, **ANITA LORENE COOPER** agreed to distribute a large amount of methamphetamine to **JASON DON ROWAN**.

- 51. On or about May 23, 2020, RICHARD DEAN MEALER agreed to distribute an amount of methamphetamine to ANITA LORENE COOPER.
- 52. On or about May 24, 2020, **ANITA LORENE COOPER** agreed to purchase a large amount of methamphetamine from an individual in Wagoner County, Oklahoma.
- 53. On or about May 25, 2020, ANITA LORENE COOPER agreed to purchase an amount of methamphetamine from an individual in Tahlequah, Oklahoma.
- 54. On or about May 30, 2020, **EVERETT WAYNE HOOD JR.** agreed to pay **ANITA LORENE COOPER** proceeds owed from the sale of methamphetamine.
- 55. On or about May 31, 2020, **ANITA LORENE COOPER** purchased an amount of methamphetamine from an individual in Peggs, Oklahoma.
- 56. On or about June 2, 2020, **EVERETT WAYNE HOOD JR.** and another individual distributed an amount of methamphetamine to **ANITA LORENE COOPER** in Locust Grove, Oklahoma.
- 57. On or about June 3, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to **AMANDA JOYCE KING**.
- 58. On or about June 3, 2020, **ANITA LORENE COOPER** purchased an amount of methamphetamine from an individual in Choteau, Oklahoma.
- 59. On or about June 3, 2020, **CLINT ENGLAND COOPER** picked up drug proceeds from an individual in Hulbert, Oklahoma for **ANITA LORENE COOPER**.
- 60. On or about June 3, 2020, ANITA LORENE COOPER met with SCOTT JAMES LIVELY in Muskogee, Oklahoma to pick up drug proceeds.

- On or about June 4, 2020, ANITA LORENE COOPER and CLINT ENGLAND

 COOPER traveled to BLANCHE ELIZABETH DYER's residence in Oklahoma City,

 Oklahoma to pick up a large amount of methamphetamine.
- 62. On or about June 4, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to an individual in Wagoner County, Oklahoma.
- 63. On or about June 4, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to **SCOTT JAMES LIVELY** in Fort Gibson, Oklahoma.
- 64. On or about June 4, 2020, **ANITA LORENE COOPER** distributed 50 grams or more of methamphetamine (actual).
- 65. On or about June 4, 2020, MICHAEL OTIS HUNSAKER JR., possessed with the intent to distribute 50 grams or more of methamphetamine (actual)
- 66. On or about June 5, 2020, ANITA LORENE COOPER distributed 5 grams or more of methamphetamine (actual) to MARK ROBERT PIERCE.
- 67. On or about June 5, 2020, ANITA LORENE COOPER distributed 5 grams or more of methamphetamine (actual) to JOSEPH MICHAEL PHILLIPS in Locust Grove, Oklahoma.
- 698. On or about June 5, 2020, ANITA LORENE COOPER agreed to distribute methamphetamine to AMANDA JOYCE KING.
- 69. On or about June 5, 2020, **ANITA LORENE COOPER** agreed to distribute methamphetamine to an individual in Wagoner County, Oklahoma.
- 70. On or about June 6, 2020, ANITA LORENE COOPER and MICHAEL OTIS HUNSAKER JR. traveled to BLANCHE ELIZABETH DYER's residence in Oklahoma City, Oklahoma to pick up a large amount of methamphetamine.

- 71. On or about June 6, 2020, **ANITA LORENE COOPER** distributed an amount of methamphetamine to **JOSEPH MICHAEL PHILLIPS**.
- 72. On or about June 6, 2020, **ERIC YSIDRO CASTILLO** traveled to El Paso, Texas to organize a shipment of methamphetamine from Mexico to Oklahoma.
- 73. On or about June 6, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to **SCOTT JAMES LIVELY** in Wagoner County, Oklahoma.
- 754. On or about June 7, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to **AMANDA JOYCE KING** in Wagoner County, Oklahoma.
- 75. On or about June 7, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to an individual in Wagoner County, Oklahoma.
- 76. On or about June 8, 2020, MICHAEL OTIS HUNSAKER JR. and ANITA LORENE COOPER traveled to MARK LEWIS CROWELL's residence in Oklahoma City, Oklahoma to pick up 50 grams or more of methamphetamine (actual).
- 77. On or about June 8, 2020, CLINT ENGLAND COOPER traveled to ANITA LORENE COOPER's residence to pay her proceeds from the sale of methamphetamine.
- 78. On or about June 8, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to AMANDA JOYCE KING.
- 79. On or about June 8, 2020, **ANITA LORENE COOPER** distributed an amount of methamphetamine to an individual in Muskogee, Oklahoma.
- 80. On or about June 8, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to an individual in Muskogee, Oklahoma.
- 81. On or about June 8, 2020, SCOTT JAMES LIVELY agreed to pick up drug proceeds for ANITA LORENE COOPER.

- 82. On or about June 8, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to SCOTT JAMES LIVELY.
- 83. On or about June 9, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to JOSEPH MICHAEL PHILLIPS in Wagoner County, Oklahoma.
- 84. On or about June 9, 2020, **ANITA LORENE COOPER** received drug proceeds from an individual in Wagoner County, Oklahoma.
- 85. On or about June 9, 2020, **ANITA LORENE COOPER** agreed to distribute an amount of methamphetamine to an individual in Muskogee, Oklahoma.
- 86. On or about June 9, 2020, ANITA LORENE COOPER and SCOTT JAMES LIVELY agreed to distribute an amount of methamphetamine.
- 87. On or about June 10, 2020, ANITA LORENE COOPER distributed an amount of methamphetamine to JOSEPH MICHAEL PHILLIPS in Muskogee, Oklahoma.
- 88. On or about June 10, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to JOSEPH MICHAEL PHILLIPS in Wagoner County, Oklahoma.
- 89. On or about June 10, 2020, ANITA LORENE COOPER agreed to distribute an amount of methamphetamine to AMANDA JOYCE KING.
- 90. On or about June 10, 2020, **ANITA LORENE COOPER** distributed an amount of methamphetamine to an individual in Muskogee, Oklahoma.
- 91. On or about June 11, 2020, ANITA LORENE COOPER and MICHAEL OTIS HUNSAKER JR. traveled to Oklahoma City, Oklahoma to pick up a large amount of methamphetamine from MARK LEWIS CROWELL.

- 92. On or about June 11, 2020, **ANITA LORENE COOPER** agreed to distribute methamphetamine to an individual in Wagoner County, Oklahoma.
- 93. On or about June 11, 2020, SCOTT JAMES LIVELY agreed to let ANITA LORENE COOPER and MICHAEL OTIS HUNSAKER JR. store a large amount of methamphetamine at his residence in Muskogee, Oklahoma.
- 94. On or about June 11, 2020, ANITA LORENE COOPER agreed to distribute methamphetamine to SCOTT JAMES LIVELY.
- 95. On or about June 12, 2020, ANITA LORENE COOPER agreed to distribute methamphetamine to JOSEPH MICHAEL PHILLIPS in Wagoner County, Oklahoma.
- 96. On or about June 12, 2020, SCOTT JAMES LIVELY agreed to meet ANITA LORENE COOPER to pay her proceeds from the sale of methamphetamine.
- 97. On or about June 13, 2020, ANGELA MARIE MCDANIEL traveled to MARK LEWIS CROWELL's residence in Oklahoma City to pick up methamphetamine for ANITA LORENE COOPER.
- 98. On or about June 13, 2020, ANITA LORENE COOPER agreed to distribute methamphetamine to AMANDA JOYCE KING.
- 99. On or about June 14, 2020, **ERIC YSIDRO CASTILLO** traveled to Mexico to organize a shipment of methamphetamine from Mexico to Oklahoma.
- 100. On or about June 14, 2020, ANITA LORENE COOPER agreed to distribute methamphetamine to CARA DAWN NICOLE O'LAUGHLIN.
- 101. On or about June 18, 2020, MARK LEWIS CROWELL possessed \$103,700 in proceeds from the sale of methamphetamine.

- 102. On or about June 18, 2020, **ANITA LORENE COOPER** possessed with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine.
- 103. On or about June 18, 2020, ANITA LORENE COOPER possessed a Walther Model P22 model .22 caliber semi-automatic pistol in furtherance of a drug trafficking crime.
- 104. On or about July 16, 2020, **RICHARD DEAN MEALER** distributed an amount of methamphetamine in Okay, Oklahoma.

All in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B); and 18 U.S.C. § 2]

On or about June 10, 2019, within the Eastern District of Oklahoma, the defendant, **ANITA LORENE COOPER**, did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18 United States Code, Section 2.

COUNT THREE

FELON IN POSSESSION OF FIREARM [18 U.S.C. §§ 922(g)(1) & 924(a)(2)]

On or about June 14, 2019, in the Eastern District of Oklahoma, the defendant, ANITA LORENE COOPER, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess, in and affecting commerce, a firearm, to wit:

• One Heritage Rough Rider .22 caliber revolver,

- One Raven Arms Model MP-25 .25 semi-automatic pistol,
- One Glock Model 22 .40 caliber semi-automatic pistol,
- One EIG Cutlery .38 special revolver,
- One Charter Arms Undercover .38 special revolver,
- One Sccy Model CPX-1 9mm semi-automatic pistol,
- One Rossi made by Taurus 351 revolver,
- One Heckler Koch P30 9mm semi-automatic,

which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FOUR

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]

On or about June 25, 2019, within the Eastern District of Oklahoma, the defendant, **EVERETT WAYNE HOOD JR.**, did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FIVE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C); and 18 U.S.C. § 2]

On or about October 13, 2019, within the Eastern District of Oklahoma, the defendants, ANITA LORENE COOPER and MARK WAYNE STUBBLEFIELD, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United

States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18 United States Code, Section 2.

COUNT SIX

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C); and 18 U.S.C. § 2]

On or about December 18, 2019, within the Eastern District of Oklahoma, the defendants, ANITA LORENE COOPER and JESSICA LYNN BAKER, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and Title 18 United States Code, Section 2.

COUNT SEVEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C); and 18 U.S.C. § 2]

On or about January 15, 2020, within the Eastern District of Oklahoma, the defendants, **JARROD LEE SHANKS** and **CARA DAWN NICOLE O'LAUGHLIN**, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHT

FELON IN POSSESSION OF FIREARM [18 U.S.C. §§ 922(g)(1) & 924(a)(2)]

On or about January 15, 2020, within the Eastern District of Oklahoma, defendant, JARROD LEE SHANKS, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting interstate commerce, a firearm, to wit: One Taurus Model PT738 TCP .380 acp semi-automatic pistol, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT NINE

POSSESSION OF FIREARM IN FURTHERANCE OF DRUG TRAFFICKING CRIME [18 U.S.C. § 924(c)]

On or about January 15, 2020, within the Eastern District of Oklahoma, defendant, **JARROD LEE SHANKS**, did knowingly possess a firearm, to wit: One Taurus Model PT738 TCP .380 acp semi-automatic pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Methamphetamine as alleged in Count Seven, in violation of Title 18, United States Code, Section 924(c).

COUNT TEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

On or about January 21, 2020, within the Eastern District of Oklahoma, the defendant, **ANITA LORENE COOPER**, did knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT ELEVEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

On or about February 11, 2020, within the Eastern District of Oklahoma, the defendant,

ANITA LORENE COOPER, did knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWELVE

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]

On or about February 22, 2020, within the Eastern District of Oklahoma, the defendant, **ANITA LORENE COOPER**, did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THIRTEEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]

On or about February 26, 2020, within the Eastern District of Oklahoma, the defendant, ANITA LORENE COOPER, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT FOURTEEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

On or about March 11, 2020, within the Eastern District of Oklahoma, the defendant, ANITA LORENE COOPER, did knowingly and intentionally distribute 50 grams or more of

methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT FIFTEEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B)]

On or about May 14, 2020, within the Eastern District of Oklahoma, the defendant, **ANITA LORENE COOPER**, did knowingly and intentionally distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SIXTEEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C); and 18 U.S.C. § 2]

On or about May 21, 2020, within the Eastern District of Oklahoma, the defendants, ANITA LORENE COOPER and BOBBI DAWN BENEFIELD, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

On or about June 4, 2020, within the Eastern District of Oklahoma, the defendant, **ANITA LORENE COOPER**, did knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT EIGHTEEN

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)]

On or about June 4, 2020, within the Eastern District of Oklahoma, the defendant, **MICHAEL OTIS HUNSAKER JR.**, did knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT NINETEEN

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(B); and 18 U.S.C. § 2]

On or about June 5, 2020, within the Eastern District of Oklahoma, the defendants, ANITA LORENE COOPER and MARK ROBERT PIERCE, did knowingly and intentionally distribute 5 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); and Title 18 United States Code, Section 2.

COUNT TWENTY

POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)]

On or about June 18, 2020, within the Eastern District of Oklahoma, the defendant, ANITA LORENE COOPER, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

FELON IN POSSESSION OF A FIREARM [18 U.S.C. §§ 922(g)(1) & 924(a)(2)]

On or about June 18, 2020, within the Eastern District of Oklahoma, defendant, ANITA LORENE COOPER, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing of such conviction, did knowingly possess in and affecting interstate commerce, a firearm, to wit: One Walther Model P22 model .22 caliber semi-automatic pistol, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-TWO

POSSESSION OF FIREARM IN FURTHERANCE OF DRUG TRAFFICKING CRIME [18 U.S.C. § 924(c)]

On or about June 18, 2020, within the Eastern District of Oklahoma, defendant, ANITA LORENE COOPER, did knowingly possess a firearm, to wit: Walther Model P22 model .22 caliber semi-automatic pistol, in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute Methamphetamine as alleged in Count Twenty, in violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-THREE

DISTRIBUTION OF METHAMPHETAMINE [21 U.S.C. §§ 841(a)(1) & 841(b)(1)(C)]

On or about July 16, 2020, within the Eastern District of Oklahoma, the defendant, **RICHARD DEAN MEALER**, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in

violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

The allegations contained in Counts Three, Twenty-One, and Twenty-Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Counts Three, Twenty-One, and Twenty-Two of this Indictment involving violations of Title 18, United States Code, Section 922(g)(1), 924(a)(2), and 924(c), the defendant, ANITA LORENE COOPER, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

- A Heritage Rough Rider .22 caliber revolver bearing serial number C69475, and associated ammunition;
- A Raven Arms Model MP-25 .25 semi-automatic pistol SN 1399382, and associated ammunition;
- A Glock Model 22 .40 caliber semi-automatic pistol bearing serial number SAPR058, and associated ammunition;
- An EIG Cutlery .38 special revolver bearing serial number A2424, and associated ammunition;
- A Charter Arms Undercover .38 special revolver bearing serial number 37707, and associated ammunition;
- A Sccy Model CPX-1 9mm semi-automatic pistol bearing serial number 022811, and associated ammunition;
- A Rossi made by Taurus 351 revolver bearing serial number IN74698, and associated ammunition;

- A Heckler Koch P30 9mm semi-automatic bearing serial number 129-075371, and associated ammunition;
- A Walther Model P22 model .22 caliber semi-automatic pistol, serial number WA140525, and associated ammunition:

FORFEITURE ALLEGATION

[18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

The allegations contained in Counts Eight and Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the violations alleged in Counts Eight and Nine of this Indictment involving violations of Title 18, United States Code, Section 922(g)(1), 924(a)(2), and 924(c), the defendant, **JARROD LEE SHANKS**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offenses, including, but not limited to:

• A Taurus Model PT738 TCP .380 acp semi-automatic pistol, serial number 18142E.

FORFEITURE ALLEGATION

[21 U.S.C. § 853]

The allegations contained in Counts One through Two, Four through Seven, Ten through Twenty, and Twenty-Three of this indictment, are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853.

Upon conviction of the violations alleged in in Counts One through Two, Four through Seven, Ten through Twenty, and Twenty-Three of this Indictment, involving violations of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), and Title 18, United States Code, Section 2, the defendants, ERIC YSIDRO CASTILLO,

BLANCHE ELIZABETH DYER, ANITA LORENE COOPER, MARK LEWIS CROWELL, ANGELA MARIE MCDANIEL, MICHAEL OTIS HUNSAKER JR., JASON DON ROWAN, CLINT ENGLAND COOPER, SCOTT JAMES LIVELY, RICHARD DEAN MEALER, JESSICA LYNN BAKER, BOBBI DAWN BENNEFIELD, MARK ROBERT PIERCE, MARK WAYNE STUBBLEFIELD, CARA DAWN NICOLE O'LAUGHLIN, JARROD LEE SHANKS, AMANDA JOYCE KING, JOSEPH MICHAEL PHILLIPS, and EVERETT WAYNE HOOD JR., shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to, the following:

REAL PROPERTY

The residence at 34005 East 686 Road, Locust Grove, Oklahoma, belonging to ANITA
 LORENE COOPER;

U.S. CURRENCY

\$103,700 in U.S. Currency, seized from MARK LEWIS CROWELL in Oklahoma City,
 Oklahoma or about June 18, 2020;

VEHICLES

A 2017 Nissan Altima, gray in color, Oklahoma license plate IVN 284, VIN 1N4AL3AP1HN348340, registered to MARK LEWIS CROWELL at 6200 Winfield Drive, Oklahoma City, OK 73162;

MONEY JUDGMENT

An asset forfeiture money judgment in the amount of proceeds obtained by the conspiracy and by the defendant.

If any of the property described above, as a result of any act or omission of the defendants:

- cannot be located upon the exercise of due diligence; a.
- has been transferred or sold to, or deposited with, a third party; b.
- has been placed beyond the jurisdiction of the court; c.
- has been substantially diminished in value; or d.
- has been commingled with other property which cannot be divided without e. difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL.

BRIAN J. KUESTER United States Attorney

CHRISTOPHER D. SCHROEDER

Special Assistant United States Attorney

Pursuant to the E-Government Act, the original indictment has been filed under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY